

KEANE & ASSOCIATES

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April 22, 2021

SENT VIA E-FILE

Honorable Katherine Polk Failla
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

**Re: Ohio Security Insurance Company v. Travelers Indemnity Company
of Connecticut
1:20-cv-10439-KPF**

Your Honor:

I am Senior Counsel in the office of Keane & Associates and represent the Defendant, Travelers Indemnity Company of Connecticut ("Travelers") in the above-captioned matter. Travelers, on behalf of all parties, seeks an adjournment of the Initial Pretrial Conference that is scheduled for April 30, 2021 for thirty (30) days. Laura S. Puhala, Esq. of Jaffe & Asher LLP, counsel for Ohio Security Insurance Company, consents to this application.

By letter dated March 18, 2021 (D.E. 13), the parties informed the Court that they had reached a settlement in principle, which would resolve this matter. The Court granted this request. Since that time, Travelers has been reviewing the defense costs at issue in the matter and that are subject of the settlement. The parties have been in discussion recently about a few remaining issues for which there is a dispute. Currently, the parties are working on resolving these last remaining issues, which are relatively minor in amount. The parties expect that they will be able to reach an agreement as to all remaining issues within the next week or two.

Travelers Indemnity Company of Connecticut, therefore, respectfully requests that this Court grant an adjournment of the Initial pretrial Conference for a period of thirty (30) days.

We thank the Court for its consideration of this matter.

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company And its Property Casualty Affiliates

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Very truly yours,

/s/Brent S. Usery

Brent S. Usery

cc: All Counsel by ECF

The Court appreciates the parties' above update regarding the status of their settlement discussions, and wishes to ensure that the parties have adequate time to continue those discussions. The initial pretrial conference scheduled for April 30, 2021, is accordingly ADJOURNED to June 2, 2021, at 4:00 p.m.

Dated: April 22, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE

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